

February 24, 2022

The Honorable John P. Cronan  
United States District Judge, Southern District of New York  
500 Pearl Street, Room 1320  
New York, NY 10007

Re: *Moshell v. Sasol Limited*, No. 20-cv-01008-JPC (S.D.N.Y.)  
Joint Letter Seeking Stay of Current Case Schedule and Rulings on Pending Motions

Dear Judge Cronan:

The parties in the above-referenced action have reached a provisional settlement of the above-referenced action after completing mediation before the Honorable Daniel Weinstein (Ret.) and Ambassador David Carden on February 16-17, 2022.

We write jointly on behalf of the parties to respectfully request that all current case deadlines outlined in the Revised Scheduling Order [ECF No. 162] and rulings on all pending motions, including Plaintiffs' Motion for Class Certification, Appointment of Class Representatives, and Appointment of Class Counsel [ECF No. 82] and Defendants' Motion to Certify the July 24, 2021 Opinion and Order for Interlocutory Appeal and to Stay Further Proceedings Pending Appeal [ECF No. 151], be stayed pending submission of final settlement documentation. The parties will submit the necessary final settlement documentation to the Court for its approval within the next forty-five (45) days.

Respectfully submitted,

By: /s/ Steve W. Berman

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The request is granted; this case is stayed, and all deadlines are adjourned *sine die*. The parties shall submit dismissal papers, or in the alternative, a status letter by April 8, 2022.

SO ORDERED.  
Date: February 24, 2022  
New York, New York

  
JOHN P. CRONAN  
United States District Judge